

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

_____)	
THE EQUAL RIGHTS CENTER,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:06-cv-01060-CCB
)	
EQUITY RESIDENTIAL, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**JOINT MOTION TO EXTEND DEADLINES REGARDING REPLIES ON
MOTIONS FOR PARTIAL SUMMARY JUDGMENT AND TO SET BRIEFING
SCHEDULE FOR CROSS MOTION FOR PARTIAL SUMMARY JUDGMENT**

The Parties jointly move and stipulate to extend each of the remaining deadlines on the pending Motions for Partial Summary Judgment and to set a briefing schedule on Defendants' Cross Motion for Summary Judgment. The Parties state in support as follows:

1. Plaintiff filed a motion for partial summary judgment as to nine designated properties. Defendants filed a motion for partial summary judgments as to twelve other designated properties (the "Motions"). In accordance with the Court's previous scheduling orders, the Parties filed their respective responses to the Motions, along with supporting materials, on April 19, 2010. In addition, on April 19, 2010, the Defendants filed their Cross Motion for Summary Judgment as to the Plaintiff's Nine Designated Properties (the "Cross Motion").

2. The current schedule sets June 9, 2010 as the end of the discovery period relating to replies on the Motions and June 16, 2010 as the deadline for the parties to file their replies on the respective Motions. The current schedule will not provide the Parties with adequate time to

conduct discovery and file their replies, nor does the current schedule provide for a briefing schedule and discovery related to the Cross Motion. The Parties, therefore, stipulate and request an extension of the original deadlines and creation of a schedule for the Cross Motion.

3. Accordingly, the Parties agree to the following revised schedule to govern the Motions and Cross Motion:

End of discovery period needed to reply to the Motions and to respond to the Cross Motion	August 20, 2010
Parties file their reply briefs regarding the Motions and response to Cross Motion	September 14, 2010
End of discovery period needed to reply on Cross Motion	October 29, 2010
Defendants file reply on Cross Motion	November 19, 2010

WHEREFORE, the Parties respectfully request that the Court enter the scheduling order as indicated above.

Dated: April 30, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a copy of the foregoing **JOINT MOTION TO EXTEND DEADLINES REGARDING REPLIES ON MOTIONS FOR PARTIAL SUMMARY JUDGMENT AND TO SET BRIEFING SCHEDULE FOR CROSS MOTION FOR PARTIAL SUMMARY JUDGMENT** was served via the CM/ECF electronic filing system on this 30th day of April, 2010, and thereby served upon counsel for all parties.

By: /s/ Beth L. Fancsali
One of the Attorneys for Defendants